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April 18, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RE: WT Docket No. 97-81

Dear Mr. Caton:

The attached comments are submitted by Puget Sound Energy, Inc. (formerly Puget Sound Power & Light Company), in response to the Federal Communications Commission's Notice of Proposed Rule Making (NPRM) on WT Docket No. 97-81.

Respectfully submitted,

Puget Sound Energy, Inc.

By:

Ranjan Bhagat
Manager, Energy Control Systems and
Telecommunication Services

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Amendment of the Commission's Rules) WT Docket No. 97-81
Regarding Multiple Address Systems)

To: The Commission

Comments of Puget Sound Energy, Inc.

Pursuant to Section 1.415 of the Federal Communications Commission's (FCC) Rules, Puget Sound Energy, Inc. (formerly Puget Sound Power & Light Company), hereby submits its comments in response to the FCC's Notice of Proposed Rulemaking (NPRM) in the above-captioned proceeding.

I. Puget Sound Energy, Inc.

Puget Sound Energy, Inc. (PSE) is the largest combination gas and electric distribution company in the State of Washington, providing service to over 1,100,000 gas and electric customers in Washington State. PSE serves some of the fastest growing areas in Western Washington, and its customer base includes companies such as Boeing, Microsoft, Nintendo,

AT&T Wireless, and many other high technology, high growth businesses. PSE also serves the State Capital in Olympia, surrounding government centers, and several strategic military facilities such as the Trident Submarine Base at Bangor, McCord Air Force Base, Fort Lewis, Whidbey Island Naval Air Station, and the Naval Undersea Weapons Center at Keyport. All of these customers require and expect reliable electric service.

II. Puget Sound Energy, Inc.'s Use of 928/952/956 MHz MAS Channels

PSE currently holds licenses for twelve (12) MAS channels. These point-to-multipoint channels are used exclusively for internal applications, and they support over 50 remote terminal units (RTU) that are used for critical power system monitoring as well as automatic and manual control applications. Furthermore, the fact that PSE's power system is tightly interconnected and integrated with all other Pacific Northwest utilities, the Bonneville Power Administration (BPA), and the rest of the Western Systems Coordinating Council (WSCC) makes the operation and reliability of PSE's power system critical to the operational stability and reliability of the entire WSCC area. WSCC is made up of the eight states of Washington, Oregon, Idaho, Montana, California, Arizona, Nevada, New Mexico, British Columbia and Alberta, Canada, and the CFE (Mexico). If any disturbance anywhere in this vast region is not properly controlled, it can cascade to other far removed portions of the area. This control is currently achieved in large part through the use of 928/952 MHz channels.

PSE utilizes these MAS channels for internal applications only, and PSE has never used, nor does it intend to use these channels for "for-profit" applications. Because of the critical role

that the MAS channel applications have in the control and operation of PSE's electric distribution system, PSE opposes the changes proposed in the NPRM.

III. Requested Action

1. Retain MAS Channels for Utility and Pipeline Use

There is currently a shortage of MAS channels in PSE's operating area. PSE's experience has shown that MAS is a very reliable and cost effective means of communicating with RTUs for system control, and PSE would utilize additional MAS channels if they were available. It is imperative that no action be taken to reduce the availability of MAS channels for use by utilities and pipelines.

2. Private/Commercial Operations

While there may be some commercial operations on the subject channels, data indicates that this band is used primarily for private operations. In keeping with the predominantly private use and the unique use of this band by utilities and pipelines, this band should be designated for private use only.

3. Economic Area Licensing

Due to the lack of any detailed information regarding the FCC's proposal for geographic licensing based on 175 Economic Areas (EA), PSE opposes this geographic licensing proposal.

As noted earlier, MAS channels are an essential part of PSE's monitoring and control system. The NPRM does not identify what safeguards will be provided to ensure that PSE can continue to use its existing MAS channels on the non-interfering basis required for reliable operations. Without the notification and coordination activities associated with normal site-to-site licensing processes, EA licensing will not provide adequate interference protection for existing systems.

4. Other Applications

PSE opposes the proposal to permit mobile, point-to-point, and point-to-multipoint operations on these channels on a co-equal basis.

While this proposal would provide all licensees with increased flexibility, the proposal does not adequately address the question of protecting incumbent users from interference to the systems they are using for their critical power system control applications.

IV. 932/941 MAS Channels

The FCC, in its proposal to reallocate the 932/941 MHz channels, has appropriately recognized the importance of a set-aside for "Federal Government/public safety" channels. However, utilities and pipelines should also receive similar considerations and be included in the Federal Government/public safety set-aside for the 932/941 MHz channels for critical internal applications. Precedence for such special considerations for utilities and pipelines has already been established by the FCC in its *Second Report and Order* in PR Docket No. 92-235.

Having access to the 932/941 MHz channel set-asides would enable utilities and pipelines to satisfy their currently unmet demands for additional MAS channels for critical power system control applications.

WHEREFORE, THE PREMISES CONSIDERED, Puget Sound Energy, Inc.
respectfully requests the Federal Communications Commission to take action in accordance with the views expressed in these comments.

Respectfully Submitted,

Puget Sound Energy, Inc.

By:



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Manager, Energy Control Systems
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